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Before the
Federal Communications Commission
Washington, D.C. 20544

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In the matter of)	WT Docket No.98-143
1998 Biennial Regulatory Review)	RM-9148
Amendment of Part 97)	RM-9150
of the Commissions')	RM-9196
Amateur Service Rules)	

COMMENTS OF

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I, Gil Brentley, hereby file these comments on 30 November, 1998,
re: the F.C.C.'s Notice of Proposed Rulemaking, WT Docket 98-143.

Summary: A) The F.C.C. proposal for restructuring has merit only
if it results in a form of simplification that 1) reduces license
processing workload, and 2) restructures with a minimum of
confusion and transitional discontinuities, 3) retains as much
HF Band allocations structure for resulting license classes as
possible (for the modified license classes), and 4) very importantly,
offers real incentive and challenge to individuals testing for
advancement; B) Simple elimination of two (previous) entry-
level license classes may reduce F.C.C. license processing work-
load, but will not, by itself, offer the present or prospective

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Amateur Radio Community the best or most appropriate solutions or alternatives to licensing and/or band privlidges. C) A Chart of proposed (HF) Band allocations is included to offer a modified alternative to the A.R.R.L. band allocation proposal.

Personal Credentials: G.D.Brentley, graduate of Portland State University, 1969, Military Veteran(Korea)U.S.Army Missile Command;; volunteer teacher - Portland School District - Seven years; interpretation of High-Altitude Infra-red images of Meso-American Archaeological sites of Northern Guatemala (the Peten) and Yucatan; father of three children (who achieved many accomplishments in high-school academics); licensed as General Class in 1981, then Advanced, then Extra in 1989.

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Comments as follows:

- I) Retain and/or adopt the A.R.R.L. Proposal, in concept,
for Four (4) License Classes;
- II) Modify the proposed license class (privlidge) upgrade license tests
to include a CW element to justify additional CW sub-band
privlidges:
- III) Modify the (A.R.R.L.) HF Amateur Band proposals to provide
and allow CW sub-band privlidges for each license upgrade;
- IV) Retain increasingly higher levels of difficulty (of written
examinations) for successively higher license classes;
- V) Retain an entry level license with VHF and UHF privlidges.

Philosophy of above proposal: Three things are implicit and highly important regarding the above proposals: A) Severly reducing code requirements for HF band privlidges will ultimately result in an extremely relaxed (possibly near chaotic) CW and Voice operations in the HF Spectrum (Not desireable); B) Retaining an entry level license class with VHF and UHF privlidges with no code requirement, is paramount to attracting and maintaining new licensees who have computer skills and interests in operating through the Amateur international satellites. A large number of future satellite, cellular and computer technicians and engineers will most likely come from this very important group of licensees. C) As is widely known in the educational community of this country, simply making getting a high-school diploma easier for students, does not produce an educated class or generation of future U.S. citizens. (The analogy speaks for itself).

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Chart of Proposed Spectrum
to align with proposed license Class's D,C,B & A

License Class	(formerly called)	Code Requirement	(Code Alternate)	Proposed Spectrum Privlidges	
				<u>CW</u>	<u>Voice</u>
D	(Tech.)	N/A	N/A	50 MHz & up	
C	(Gen.)	5 wpm	(5 wpm)	1.8 same	
				3.530-3.60	3.75-4.000
				7.030-7.10	7.17-7.300
				14.030-14.1	14.20-14.350
				21.030-21.1	21.25-21.450
				28.030-28.3	28.30-28.600
	WARC	10.1 MHz, 24.89 MHz			
B	(Adv.)	12 wpm	(10wpm)	1.8 same	
				3.520-3.650	3.70-4.000
				7.020-7.100	7.12-7.300
				14.020-14.12	14.17-14.35
				21.020-21.15	21.17-21.45
				28.020-28.30	28.30-28.80
	WARC	10.1, 24.89, 18.68			
A	(Extra)	18 wpm	(15wpm)	1.8 same	
				3.50-3.650	3.65-4.000
				7.00-7.100	7.10-7.300
				14.00-14.15	14.15-14.35
				21.00-21.15	21.15-21.45
				28.00-28.30	28.30-29.70
	WARC	10.1, 24.89, 18.68			

Note: A very close scrutiny of this proposed Spectrum Allocation will show reasonable privlidges for each license class, with additional CW and Voice spectrum for each upgrade, on each major band (HF). For example, upgrading from Class C to B would allow 10 KHz of DX Window at the lower (CW) end of 20 meters, as well as 20 KHz at the upper CW end, and an additional 30 KHz of Voice spectrum, for a total of 60 KHz on 20 mtrs. The Class A (Extra Class) Code requirement remains in place, to justify additional CW & Voice spectrum in the DX sections of all major bands.

Conclusion and Recommendations:

If the included licensing and band-plan proposal appears too complicated and/or confusing for members of the Commission, then the following is recommended:

- A) Adopt the Four (4) level A.R.R.L. license (class) structure proposal, in concept;
- B) Adopt a progressive 5 word per-minute code requirement for each license upgrade, in order to improve proficiency and to justify additional Voice and CW Spectrum on the HF Bands - (See Chart included under "Code-Alternate" column).
- C) Retain an entry level license class with VHF and UHF privileges with no-code requirements, for the reasons stated;
- D) After adoption, follow-up in Six to Eight years with a review of the modified structure and with input from the A.R.R.L. and the Amateur Community at large. (This will also allow adjustments to Y2K in the various governmental, business and private sectors).



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